

I support this Proposed Rule Making. This RM is well written and should be considered to it's fullest. Pactor III is a mode that does not belong on the amateur radio bands as it has been touted as a commercial protocol. This mode listens only in the pass band of the Pactor 1 protocol and does not listen within the whole 3khz bandwidth. When it switches to the higher bandwidth it has the potential of causing interference with other amateur radio communications adjacent to its starting bandwidth. This mode is not ideal for a frequency sharing service such as the Amateur Radio Service and should be relegated to the commercial only services. Pactor I and Pactor II are narrow band modes and do not change bandwidths after initial connection. This RM illustrates this mode in detail. Giving Pactor III free reign as RM-11306 would have done would have created chaos on the amateur radio bands. This RM was withdrawn due to the overwhelming response of amateur radio operators. This RM will minimize the interference that we as amateur radio operators face today dealing with the Pactor III interference that is rampant in the automatic sub-bands.

Also defining what an automatically controlled station and remotely controlled station are is important as the definition of a remotely controlled station means it can be manipulated and parameters can be changed. Automatic operations can not be changed by a remote user. They only answer to a call and transfer data to and from the station. Winlink 2000 stations have been touted as being controlled by the station initiating the connection when in fact the initiating station has no way of controlling the Winlink 2000 station and therefore should not be considered a remotely controlled station. Automatically controlled stations as well as remotely controlled stations should adhere to the Part 97 rules regarding interference. Both stations should be held accountable for interference, not just the initiating station. If the automatically controlled station cannot determine if a frequency is busy before transmitting, then that station should not be allowed to operate on the amateur radio bands.

Respectfully submitted,
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